

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
	:	
DONALD FRANCIS KELLY, II	:	CASE NO. 1:13-bk-04693
Debtor	:	

MOTION TO REINSTATE THE CASE

COMES NOW the Debtor, by and through Kara K. Gendron, Esquire, and requests that the case be reinstated, respectfully stating in support thereof:

1. The Debtor filed a Chapter 13 Petition on September 12, 2013.
2. The Debtor fell behind in monthly payments to the Trustee.
3. The Debtor did not increase his monthly trustee payments as required under the plan, because he had obtained a loan modification and did not realize that the plan would need to be amended to remove the mortgage arrearages..
4. The Debtor has been wage attached and made payments to the trustee for nearly five years and as a result has paid \$19,163.87 into the plan.
6. The Debtor seeks to have the case reinstated so that he can file an amended plan and receive a discharge.

WHEREFORE, the Debtor respectfully requests that this Court enter an order reinstating the case and granting relief such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron

Kara K. Gendron, Esquire
Attorney ID 87577
Mott and Gendron Law
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
karagendron@gmail.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
	:	
DONALD FRANCIS KELLY, II	:	CASE NO. 1:13-bk-04693
	:	
Debtor	:	
	:	
	:	

ORDER

AND NOW,

UPON CONSIDERATION of the Motion to Reinstate the Case, it is hereby
ORDERED AND DECREED that Debtor's case is reinstated.